

UNITED STATES COURT OF APPEALS
FOR THE DISTRICT OF COLUMBIA CIRCUIT

No. 23-3106

UNITED STATES OF AMERICA,

Appellee,

v.

DANIEL GOODWYN,

Appellant.

**APPELLEE’S UNOPPOSED MOTION FOR EXTENSION OF
TIME WITHIN WHICH TO FILE APPELLEE’S BRIEF**

Pursuant to D.C. Cir. R. 27(h), appellee, the United States of America, respectfully moves this Court for a 60-day extension of time, to and including December 4, 2023, within which to file its brief in this case. Appellee’s brief is currently due on October 5, 2023. Appellee contacted counsel for appellant, Carolyn A. Stewart, Esq., who indicated that she does not oppose this request. Given the intervening holidays, however, she requests that her reply be due on December 28, 2023. This is appellee’s first request for an extension of time in this case.

As grounds for this motion, appellee states that this matter was recently assigned to Lisa Tobin Rubio, an Assistant United States

Attorney who is in the process of applying for admission to the D.C. Circuit bar. After being assigned this case, she was on medical leave and will be unable to complete the government's brief by the current due date. Although she has returned to work, she needs time to review appellant's claims and the appellate record. Given this, the appellee seeks a 60-day enlargement to ensure a thorough response on behalf of the United States and her anticipated admission to this Court's bar.

CONCLUSION

WHEREFORE, the government respectfully requests that the instant motion be granted.

Respectfully submitted,

MATTHEW M. GRAVES
United States Attorney

/s/

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CERTIFICATE OF COMPLIANCE WITH RULE 27(d)

I HEREBY CERTIFY pursuant to Fed. R. App. P. 32(g) that this motion contains 174 words, and therefore complies with the type-volume limitation of Fed. R. App. P. 27(d)(2)(A). This motion has been prepared in 14-point Century Schoolbook, a proportionally spaced typeface.

/s/

CHRISELLEN R. KOLB

Assistant United States Attorney

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have caused a copy of the foregoing motion to be served by electronic means, through the Court's CM/ECF system, upon counsel for appellant, Carolyn A. Stewart, carolstewart_esq@protonmail.com, Esq., on this 26 day of September, 2023.

/s/

CHRISELLEN R. KOLB

Assistant United States Attorney